

From: "Novak, Madi" <Novak.Elisabeth@epa.gov>
To: michael.pinto@totalenergies.com
CC: "Ebright, Stephanie" <EBRIGHT.STEPHANIE@EPA.GOV>
Date: 5/10/2022 1:08:37 PM
Subject: RE: Portland Harbor -Arkema (10TC)

Hi Mike,

I wanted to highlight some discrepancies that have been brought to our attention in the 10TC bill and provide some explanation. For the first eight invoices, the CDM Smith voucher amounts in the bill do not match the CDM Smith supporting documentation. This was a result of starting a new contract and sorting out the accounting in the initial stages of the contract. Some work wasn't charged, or was incorrectly charged, to the 10TC account. Fortunately it was resolved by invoice 9 and isn't an issue in the remaining invoices (i.e. the contractor voucher amounts match the contractor supporting documentation).

The CDM Smith supporting documentation has the correct amounts and description of the 10TC work. The net result is that the bill for each project area should have been for \$144,029.56 instead of \$142,661.85. Thus, you were undercharged by approximately \$1,300. Because we need to reconcile the first eight invoices within our accounting system, EPA is only asking for the \$142,661.85 amount cited in your current bill to be paid at this time. EPA will work with our accounting department to reconcile this discrepancy and these costs will show up as trailing charges in the next bill. No interest will accrue on this amount, and EPA will carry these costs until the next bill. Moving forward, this issue will not persist. Please let me know if you have any additional questions as you review the bill.

Also, as a reminder, below are the types of RD activities charged to the 10TC RD account:

- Programmatic Biological Assessment development (not individual site consultations, those go to specific project areas)
- Flood Rise Model development (not individual site flood rise evaluation but sitewide model development which benefits all project areas)
- Meetings: General TCT meetings, general Public Forums, general community meetings (unless they are related to one project area)
- Development of site-wide plans (e.g. HASP, split sampling QAAP, waste management plan)
- General community involvement activities and contracts related to RD (not meetings/activities that relate to just one project area)
- RD Guidelines development and sitewide general RD meetings (these benefit all project areas)
- Briefings to management, congressional calls, tribal calls, other agency and HQ meetings on general Portland Harbor RD or working through issues relating to RD unless they are related to one project area
- Community Involvement contracts and cooperative agreements related to RD that benefit all project areas

All of this work could be charged under the regular project area bills as it is RD-related, recoverable under the ASAOs, and consistent with the NCP. However, this accounting is more efficient and ultimately saves money in the overall tracking of costs. Work related to remedial action (e.g. RA Workgroup activities, PCI meetings) is not charged to the 10TC account.

Thank you,
Madi

From: Zamastil, Douglas <zamastil.doug@epa.gov>
Sent: Thursday, April 21, 2022 10:30 AM
To: michael.pinto@totalenergies.com
Cc: Novak, Madi <Novak.Elisabeth@epa.gov>; Ebright, Stephanie <EBRIGHT.STEPHANIE@EPA.GOV>; mstock@jzplaw.com; karen.traeger@external.totalenergies.com
Subject: Portland Harbor -Arkema (10TC)

Good morning,

Please see attached bill and cost summary for Portland Harbor -Arkema (10TC).

Thank you.

**Doug Zamastil - Information Management Coordinator &
Acting Cost Recovery Coordinator**

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